

November 17, 2003

Ms. Laurie Kral
Office of Air Quality Program
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Andy Ginsburg, Administrator
Air Quality Division
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, Oregon 97204

Mr. Russell Jim
Yakama Indian Nation
P.O. Box 151
Toppenish, Washington 98948

Mr. Gary Burke, Chairman
Confederated Tribes of the Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

Dear Ms. Kral, Messrs. Ginsburg, Jim and Burke:

United States Environmental Protection Agency (USEPA) and Affected State Notification and Review of Draft Significant Modification to the Hanford Site Title V Air Operating Permit (AOP)

The enclosed draft modification for your review is the first general revision to the Hanford Site Title V AOP pursuant to Washington Administrative Code (WAC) 173-401-725(4). This submittal contains three enclosures. Enclosure 1 documents two minor modifications. Enclosure 2 includes a list of change records and references. Enclosure 3 has the instruction and the entire replacement pages, including Standard Terms and Conditions, Attachment 1, and Ecology Statement of Basis. Because of the extensive nature of the revision, this modification is being processed as a significant modification, and is being reviewed and issued as such.

Ms. Kral, Messrs. Ginsburg, Jim and Burke
November 17, 2003
Page 2

The United States Department of Energy's application documents were reviewed by the Washington State Department of Ecology, and considered complete. All WAC 401-725(4) requirements will be followed for review and issuance of this revision. The public participation and comment period will start on November 25, 2003, for at least 30 days, in accordance with WAC 173-401-800 to 820.

If you have any questions regarding this notification and request for review, please contact Oliver Wang of my staff at (509) 736-3040. Thank you.

Sincerely,

Mike Wilson
Program Manager
Nuclear Waste Program

Oliver Wang
Professional Engineer
Nuclear Waste Program

MW:OW:nc
Enclosures

1. Minor Modification
2. List of change records and references
3. Instruction and the replacement pages

cc w/ attachment:

Mary Jarvis
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Dennis Bowser
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Bill Green
Fluor Hanford
P.O. Box 1000, MSIN: N1-25
Richland, Washington 99352

Barry Curn
Bechtel National
2435 Stevens Center Place, MSIN: S6-M1
Richland, Washington 99352

Ms. Kral, Messrs. Ginsburg, Jim and Burke
November 17, 2003
Page 3

Joan Woolard
Bechtel Hanford, Inc.
3350 George Washington Way
Richland, Washington 99352

Brad Atencio
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: P7-68
Richland, Washington 99352

Roy Evans
Washington State Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

John Schmidt
309 Bradley Blvd, Suite 201
Washington State Department of Health
Richland, WA 99352

cc w/o attachment:

Joel Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-58
Richland, Washington 99352

Douglas Hardesty
Office of Air Quality Program
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Al Conklin
Washington State Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

Chris Kemp
CH2M Hill Hanford Group
P.O. Box 1500, MSIN: R1-51
Richland, Washington 99352-1505

John Mattell
309 Bradley Blvd, Suite 201
Washington State Department of Health
Richland, WA 99352

Sarah Clark
Washington State Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

Administrative Record: Hanford AOP

Ken Niles
Oregon Office of Energy
625 Marion Street NE
Salem, Oregon 97301

Permit Register-Washington State
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Ms. Kral, Messrs. Ginsburg, Jim and Burke
November 17, 2003
Page 4

Enclosures

1. Minor Modifications
2. List of change records and references.
3. Instructions and replacement pages.

ENCLOSURE 1: Minor Modifications

AOP Revision G (November 2003)

- 1. 02-RCA-0313: Notice of Construction and Air Operating Permit Modification Application for the Environmental Molecular Sciences Laboratory (NOC 94-08), from Department of Energy – Richland Office (DOE-RL) to Department of Ecology (Ecology), dated April 29, 2002.**

Interim Approval: “Permission to Operate Environmental and Molecular Sciences Laboratory Emergency Generator” from Steve Lijek, Ecology, to Joel Hebdon, DOE, dated September 26, 2002.

NOC Approval: “NOC Approval Order DE03NWP-003” from Ron Skinnarland, Ecology to Joel Hebdon, DOE, dated September 30, 2003.

- 2. 02-ED-043: Transmittal of Criteria/Toxics Air Emissions Notice of Construction Revision Form for the Tank 241-C-106 Enhanced Sluicing and Retrieval Operation, from Department of Energy – Office of River Protection (DOE-ORP) to Ecology, dated January 13, 2003.**

CH2M-0205528: Contract Number DE-AC27-99RL14047, Transmittal of Criteria/Toxics Air Emissions Notice of Construction Revision Form for the Tank 241-C-106 Enhanced Sluicing Operation, from E. S. Aromi, CH2M Hill Hanford Group to R. J. Schepens, DOE-ORP, dated December 18, 2002.

NOC Approval: NOC Revision Forms, 200E C-106 Sluicing, dated 11/12/2002 and 2/24/2003

Enclosure 2: LIST OF CHANGES AND REFERENCES

AOP Revision G (November 2003)

Standard Terms and Conditions

1. Changed page header from March 2001 to October 2003 for each page.
2. Page 2, top paragraph, EPA and Ecology: Delete the reference to Attachment 4. EPA is the sole agency regarding NESFAP issues on regulatory enforcement and compliance schedules. This attachment is deleted from the Hanford Air Operating Permit.
3. Page 6 (old Page 5): Delete ATTACHMENT 4NESHAP Federal Facility Compliance Agreement.
4. Page 9 (old Page 7): Add WTP (Waste Treatment Plant). REFERENCES: (1) 02-EMD-153 Hanford Site AOP off-permit notification for the Phase I radioactive air emissions NOC and administrative amendment request for the non-radioactive air emissions NOC, application letter from Department of Energy – Office of River Protection to Ecology, dated 9/16/2002. (2) Ecology NOC Approval Order No. DE 02NWP-002 (PSD 02-01) for Waste Treatment Plant Project, dated 7/8/2002, public review period from 5/31/2002 to 7/1/2002.
5. Page 11 (old Page 8), middle of page, "The 600 Area is...": Delete the second sentence "Areas off the Hanford Site used for research and technology development and administrative functions can be found in Richland, Kennewick, and Pasco, the nearest cities." as it duplicates information in the following paragraphs.
6. Page 11 (old Page 9), Section 2.0: Changed location of Kaiser Aluminum.
7. Page 17 (old Page 13), Section 4.1: Next to last sentence "The application for...the permit term.": Delete ", the appropriate renewal fee". DOE and Ecology have an established fee-reimbursement process.
8. Page 20 (old Page 16), Section 4.3.2 Annual Air Emissions Inventory: To better define the reporting requirement add the following from WAC 173-400-105 as the 1st sentence in the paragraph: "The permittee shall upon notification by the director of Ecology, maintain records on the type and quantity of emissions from the source and other information deemed necessary to determine whether the source is in compliance with applicable emission limitations and control measures."
9. Page 20 (old Page 16), Section 4.3.2 Annual Air Emissions Inventory: To define the report contents, add the sentence "The annual air emissions inventory report will minimally contain information on no radioactive air emissions for emission points contained in AOP Attachment 1, *Tables 1.3, 1.4, 1.5 and 1.6*, for emission points where there is a specific approval condition that requires tracking in the report, and for other emission points as directed by Ecology."

10. Page 20 (old Page 16), Section 4.3.3: Changed submittal date from August 15th to September 15th (02-RCA-0187: Administrative Amendment to change date for submittal of semiannual reports, dated 2/21/2002.)
11. Page 21 (old Page 17), #6, Section 4.3.3 Semiannual Reports: Changed "Section 4.10" to "Section 4.8". (03-RCA-0093, Correct semiannual report section reference number, AOP Administrative Amendment application from DOE to Ecology, dated 12/13/2002.)
12. Page 21 (old Page 17), Section 4.3.4, Annual Compliance Certification, Item #1: Edit for clarification to read "Each emission unit-specific term or condition listed in the Attachment 1 and 2 tables, as well..." This clarification was discussed and agreed upon in the 3/19/2002 AOP Coordination Meeting.
13. Page 25 (old Page 20), Section 4.8, bold heading "**NESHAP FFCA...see Attachment 4.)**": Delete "**see Attachment 4**". This deletion is needed to reflect the removal of Attachment 4 from the AOP.
14. Page 30 (old Page 25): Add "40 CFR 60 Subpart Kb," "Liquid storage vessels less than 75 m³ (between 75 and 151 m³ with vapor pressure less than 15kPa, and greater than 151 m³ with vapor pressure less than 3.5 k Pa) subject to recordkeeping requirements only are exempt from 40 CFR 60, Subpart Kb." to AOP Standard Terms and Conditions, Table 5.1 Inapplicable Requirements. The regulation was amended in the 10/15/2003 Federal Register (68 FR 59328 see Page 59329).

Attachment 1

1. Changed page header from March 2001 to October 2003 for each page.
2. Page ATT 1-5 (old Page 1-3): Section 1.1 re-written as follows for clarity:

1.1 Insignificant Emission Units

Compliance with the cited applicable requirements in Table 1.2 (see Section 1.3) is required. However, the periodic monitoring, testing, recordkeeping, or reporting requirements listed in Table 1.2 are not required. Also the compliance certification is not required for insignificant emission units.

All emission units not identified in Table 1.1 that are subject to 40 CFR 61 Subpart H (see Attachment 2) have been determined to represent insignificant sources of non-radioactive regulated air pollutants. For these emission units no additional monitoring, reporting, or recordkeeping is necessary to determine compliance with the requirements in Table 1.2. All requirements identified in Attachment 2 for this category of emission unit continue to apply, as well as the requirement to annually certify compliance to any applicable requirements identified in Attachment 2.

These emission units need not be individually listed in the annual compliance certification unless there were observed, documented, or known instances of non-compliance during the certification period.

[WAC 173-401-530(2)(b) and (2)(c)]

3. Page ATT 1-5 (old Page 1-3): Table 1.1 re-worked into a single table for clarity.
4. Old Page 1-4: Corrected an earlier error in Tables 1.1. and 1.3, deleted 3717 and 3717B Boilers as they were mis-copied from the JCI's NOC.
5. Page ATT 1-7: Corrected Table 1.1 for three 300 Area Emergency Diesel Generators (325, 331, and 3709A) to reflect that all are subject to NOC approval, but only 325 and 331 are greater than 500 Hp.
6. Updated Tables 1.1 and 1.6 to include new approval orders issued for 300 Area Emergency Diesel Generators (REFERENCE: DE02NWP-001: NOC Approval Order for non-radioactive air emissions for the installation and operation of three emergency diesel generators located in the 300 Area, from Ecology to DOE-RL, dated 1/15/2002), Waste Treatment and Immobilization Plant [REFERENCES: (1) 02-EMD-153 Hanford Site AOP off-permit notification for the Phase I radioactive air emissions NOC and administrative amendment request for the non-radioactive air emissions NOC, application letter from Department of Energy – Office of River Protection to Ecology, dated 9/16/2002. (2) Ecology NOC Approval Order No. DE 02NWP-002 (PSD 02-01) for Waste Treatment Plant Project, dated 7/8/2002, public review period 5/31/2002 to 7/1/2002.], the Concrete Batch Plant [REFERENCES: (1) 01-EQD-030, Waste Treatment and Immobilization Plant (WTP) NOC for the Concrete Batch Plant, letter from DOE-ORP to Ecology, dated 5/23/2001, (2) DE01NWP-003: NOC Approval Order for air pollutant emissions from the Waste Treatment and Immobilization Plant Concrete Batch Plant located at 200 East Area,

and a quarry operation located at 200 East Area, from Ecology to DOE-ORP, dated 8/21/2001, (3) 01-EMD-033, Hanford Site Air Operating Permit Off-Permit Change Notification for the Concrete Batch Plant and Excavation Activities NOC, letter from DOE-ORP to Ecology, dated 11/5/2001, (4) 02-EMD-066, Proposed revision to Concrete Batch Plant NOC Approval Order DE01NWP-003 for spill reporting, letter from DOE-ORP to Ecology, dated 7/3/2002. (5) Hanford Facility Approval Order Request for Revision Approval for condition 1 revision, from Ecology to DOE-ORP, dated 7/23/2002], T Plant Complex (REFERENCE: DE01NWP-002: NOC Approval Order for T Plant toxic air pollutant emissions located in 200 West Area), and Plutonium Finishing Plant [REFERENCES: (1) 03-RCA-0035, Transmittal of Criteria Air Emission New Source Review Evaluation for Plutonium Finishing Plant 232-Z Deactivation Activities, letter from DOE to Ecology, dated 11/5/2002. (2) Letter from Ecology to DOE, Ecology Response to Air Emission New Source Review Evaluation for the PFP 232-Z Deactivation Activities, dated 11/19/2002. (3) Letter from Ecology to DOE, Follow-up on Information Request; Ecology Response to Air Emission New Source Review Evaluation for the PFP 232-Z Deactivation Activities, dated 12/18/2002.]

7. Page ATT1-7 Table 1-1: Add 300-EP-3020-12-S and -13-S (New EMSL NOC addition: DE03NWP-003)
8. Removed Boiler 3745 from Tables 1.1. and 1.3 as it has been taken out of service and moved to the 331 Building. (03-RCA-0340, Notification for removal of the 3745 Natural Gas Boiler from the Hanford Site Air Operating Permit, letter from DOE to Ecology, dated 8/8/2003.)
9. Page ATT1-22, Table 1.4: Add 300-EP-3020-12-S and -13-S, and add the 40 CFR 89 maintenance requirement to Table 1.4. (New EMSL NOC addition: DE03NWP-003)
10. Page ATT1-9 (old Page 1-7), Table 1-1 List of Significant Emission Units, and Page 1-78 (old Page 1-45) Table 1.7 Miscellaneous Emission Units: Remove 181B-66 from Table 1.1 and 1.7 due to 40 CFR 60 Subpart Kb recordkeeping exemption.
11. Removed all the 400 Area (FFTF) Heaters from Tables 1.1 for Internal Combustion Engines > 500 hp and 1.4. (03-RCA-0304, *Notice of closure for 12 fuel oil preheaters and 2 standby diesel generators at the Fast Flux Test Facility*, letter from DOE to Ecology, dated 7/9/2003)
12. Page ATT 1-15 (old Page 1-11): Correct previous error, the two 325 Boiler Annex boilers are greater than 5mmBTU/hr.
13. Page ATT 1-18 (old Page 1-13): Corrected Table 1.3, page 1-13, changed “Fuel supplier certifications and ~~quarterly~~ monthly records reported annually.” to reflect the actual practice.
14. Page ATT 1-18 (old Page 1-13): Corrected typographical error in Table 1.3 that incorrectly referenced recordkeeping as section 2.6 rather than 2.5.
15. Page ATT 1-21: Added the 40 CFR 89 maintenance requirement to Table 1.4.

16. Reformatted Table 1.6, ready for 5-year renewal format.
17. Page ATT 1-38 (old Page 1-33): Table 1.6, replaced NOC approval "NOC-94-08" with NOC approval "DE03NWP-003".
18. For consistency, changed emission unit name 100K Cold Vac Drying (old Page 1-20) to P-296K142 001 (Page ATT 1-60), and changed 200W WRAP1 001 (old Page 1-32) to P-296W004 001 (Page ATT 1-64).
19. Page ATT 1-77 (old Page 1-45): Table 1.7, Hanford Site Asbestos Landfill, corrected to include full text of requirement 40 CFR 61.151(a)(3). Removed "(3)" and included the complete text of 40 CFR 61.151(a)(1-3).
20. Page ATT 1-79 (old Page 1-46): Section 2.1, Tier 1 clarified as follows:

Tier 1

This method applies primarily to fossil-fuel combustion units and other emission units that may be a source of visible emissions. The method consists of operating personnel observing visible emissions from the emission unit according to the frequency identified in the table. If the operator observes visible emissions for more than 10 consecutive minutes during the observation period, the cause(s) of the visible emissions will be determined and corrective actions taken as necessary, or a visible determination of opacity will be performed using Ecology Method 9A. Records of corrective actions taken to reduce opacity shall be maintained and available for Ecology inspection. Visible emission surveys are to be conducted during daylight hours, after the unit has reached normal operating temperature and revolutions per minute or 15 minutes after startup.

Provided the emissions observed during Method 9A test were representative of normal operations and the Method 9A test shows the emission unit is compliant, no further observations are required until the next required periodic monitoring. Records of corrective actions taken to reduce opacity shall be maintained and available for Ecology inspection.

If after corrective actions have been taken and results from the Method 9A indicate visible emissions in excess of the limit, a deviation report will be filed with Ecology as required by Section 4.5.

21. Page ATT 1-80 (old Page 1-47): Corrected Section 2.5 to read:

"DOE and the contractor shall maintain appropriate records of the fuel use on each individual boiler on a monthly basis. These data, along with the emission factors presented in Ecology Regulatory Order 97NM-138 will be used to determine monthly emission levels for individual boilers, and collectively for the 200 East and West, and 300 Area. If Ecology or the permittee determines that emission factors different than the factors specified in

Regulatory Order 97NM-138 ~~is~~ are appropriate, the public will be provided with an opportunity for review.

WAC 173-400-115 Compliance with the standard may be determined based on a certification from the fuel supplier containing the name of the oil supplier and a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR ~~40.41c~~ 60.41b. ~~An annual~~ quarterly report including records of fuel supplier certifications and a certification by the owner or operator that the records of fuel supplier certifications submitted represent all of the fuel combusted during the year ~~quarter~~. Logs of boiler tune-ups and significant boiler maintenance activities will be kept."

22. Page ATT 1-81 (old Page 1-47): Corrected incorrect reference in Section 2.5 Recordkeeping. Changed from 40 CFR 40.41c to 40 CFR 60.41(b).

Ecology Statement of Basis - List of Changes

1. Changed header from March 2001 to October 2003.
2. Page 7 (old Page 3), Section 1 "Basis for inclusion...", 1st bullet: Actual emissions of criteria pollutants is now (after close of the coal-fired boilers) far less than 100 tpy. The 1st bullet should read "Potential to emit sulfur dioxide, nitrogen oxides, and carbon monoxide exceeds 100 tons per year." This reflects the JCI and WTP permitted levels.
3. Page 24 (old Page 18) Table (The NOC or the approval conditions identified in this table have been completed). Added completed condition for fossil fuel fired steam generating units.
4. Page 28 (old Page 23), Kaiser Aluminum was moved from the 313 Building to the 1100 Area.
5. Page 29 (old Page 23), Siemens Power Corporation is now Framatome-ANP.
6. Page 29 (old Page 23), Section 11, added PN Services to list of excluded facilities. (Rev B)
7. Page 40 (old Page 34), Item 47, 1st sentence "The pendency of...the applicable schedule.": Typo. Change "tine" to "time", so the sentence reads "...the actual time taken..."
8. Page 49 (old Page 42), Section II heading: Change typo "RENAINING" to "REMAINING".
9. Page 51 (old Page 45), near middle of column: Typos. "296-6-10" should be "296-B-10". "296-8-13" should be "296-B-13", which was a minor stack shutdown on 2/12/97.

ENCLOURE 3: Instructions and replacement pages

AOP Revision G (November 2003)

1. Replace the attached “Hanford Site Air Operating Permit ,“ Pages 1-30, with the old corresponding part.
2. Replace the attached “Attachment 1” Ecology AOP Conditions,” Pages ATT 1-1 to ATT 1-103, with the old corresponding part.
3. Delete Attachment 4 “NESHAP Federal Facility Compliance Agreement.”
4. Replace the attached “Ecology Statement of Basis,” Pages Ecology Statement of Basis-1 to Ecology Statement of Basis-36, with the old corresponding part.